

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Robert L. LeHane, Esq.
Kristin S. Elliott, Esq.
Jennifer D. Raviele, Esq. (admitted *pro hac vice*)

KELLEY DRYE & WARREN LLP

3 World Trade Center

175 Greenwich Street

New York, NY 10007

Tel: 212-808-7800

Fax: 212-808-7897

Email: rlehane@kelleydrye.com

kelliott@kelleydrye.com

jrviele@kelleydrye.com

-and-

One Jefferson Road

Parsippany, NJ 07504

Tel: 973-503-5900

Counsel for Pinnacle Hills, LLC

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.¹

Case No.: 23-13359 (VFP)

Chapter 11

Hearing Date:

Judge: Vincent F. Papalia

APPLICATION FOR ORDER SHORTENING TIME

The applicant, Pinnacle Hills, LLC (“Landlord”), requests that the time period for its motion to file under seal (the “Seal Motion”): (i) *Pinnacle Hills, LLC’s Sur-Reply in Further Support of its Objection to Debtors’ Motion for Order Authorizing Debtors to Assume and Assign Lease for Store No. 1142* (the “Sur-Reply”); and (ii) the *Declaration of Jeffrey Aronoff in Support*

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and Debtors’ service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

of Pinnacle Hills, LLC's Sur-Reply in Further Support of its Objection to Debtors' Motion for Order Authorizing Debtors to Assume and Assign Lease for Store No. 1142 (the "Declaration"), as required by Fed. R. Bankr. P. 2002, be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. Landlord requests a hearing on shortened time because, contemporaneously herewith, Landlord filed its Sur-Reply and Declaration in connection with its opposition to the assignment of its lease, which assignment is currently scheduled to be heard by the Court on August 30, 2023 (the "Assignment Hearing"). The Seal Motion seeks to seal certain portions of the Sur-Reply and Declaration. If this application is not granted, parties would have twenty-one (21) days to object to the Seal Motion, which would permit parties to file objections after the Assignment Hearing and would prevent Landlord from discussing certain important information contained in the Sur-Reply and Declaration at the Assignment Hearing. Landlord respectfully requests that the Court enter an order shortening time to consider the Seal Motion such that the Seal Motion will be heard at or before the Assignment Hearing.

2. State the hearing dates requested: Before or at the hearing set for August 30, 2023.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

Date: August 18, 2023

/s/ Robert L. LeHane

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Counsel for Pinnacle Hills, LLC